



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New  
York*

AAS/CJN  
F. #2019R01145

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 11, 2020

By Email and ECF

Moe Fodeman, Esq.  
Wilson Sonsini Goodrich & Rosati  
1301 Avenue of the Americas, 40<sup>th</sup> Floor  
New York, New York 10019

Re: United States v. Bo Mao  
Criminal Docket No. 19-392 (PKC)

Dear Mr. Fodeman:

This letter concerns the government's third production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is being delivered to your office today. This discovery supplements the government's previous productions, and further installments will follow on a rolling basis. The discovery is being produced pursuant to the Protective Order entered by the Court on January 10, 2020. See ECF Docket Entry No. 30. The government also requests reciprocal discovery from the defendant.

Description	Category of Discovery Pursuant to Protective Order	Bates Range
<p>Forensic images of:</p> <ul style="list-style-type: none"> <li>• 3093-CP1 White/Silver Apple iPhone 7 Plus; Model: A1661; SIN: C39SH9ZDHFXX; IMEI: 359176073410206; Capacity: 128 GB</li> <li>• 3093-CP1_1 Nano SIM Card; ICCID: 8901260941129457124F.</li> <li>• 3093-CP2 Pink Apple iPhone 6s Plus; Model: A1699; SIN: C39QLRY6GRX5; IMEI:359294069584205; Capacity: 64 GB.</li> <li>• 3093-CP2_1 Nano SIM Card; ICCID: 8901260941129190063F.</li> <li>• 3093-CP3 Gold Huawei Cell Phone, Model: EVA-AL10; SIN: KWG5T16620005271; IMEI:862187030187092; IMEI:861757039400760; Capacity: 64 GB.</li> <li>• 3093-CP3 _1 Nano SIM Card; ICCID: 13140049080091186894.</li> <li>• 3093-CP3 _2 Nano SIM Card; ICCID: 13150049080090696470.</li> <li>• 3093-COM1 Silver Apple MacBook Pro Laptop; Model: A1502; SIN: C02NJ9C2G3QJ</li> </ul>	DM	N/A

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Alexander Solomon  
Alexander A. Solomon  
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JAY I. BRATT  
Chief, Counterintelligence and Export  
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National Security Division, U.S. Department  
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By: /s/ Thea D. R. Kendler  
Thea D. R. Kendler  
David Lim  
Trial Attorneys

Enclosure

cc: Clerk of the Court (PKC) (by ECF) (without Enclosure)